UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4WD-RCRA

SEP 25 2000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FILE

Mr. Dan Hughes,
Environmental and Energy Manager
General Motors Assembly Plant
3900 Motors Industrial Way
Doraville, Georgia 30360-3163

SUBJ: RCRA Compliance Evaluation Inspection
EPA I.D. No. GAD 003 310 810

Dear Mr. Hughes:

On August 23, 2000, the United States Environmental Protection Agency (EPA), conducted an RCRA compliance evaluation inspection at your facility located in Doraville Georgia, in order to determine it's compliance status with EPA.

Enclosed is the EPA RCRA Site Inspection Report which indicates that no violations of RCRA were discovered. A copy of this report has also been forwarded to Georgia Environmental Protection Division (GAEPD). Pursuant to the Memorandum of Agreement, GAEPD is the lead agency for any violations cited in the report.

If you have any questions, please contact Daryl Himes, of my staff, at (404) 562-8614.

Sincerely yours,

Jeffery T. Pallas, Chief
South Enforcement and Compliance
Section
Enforcement and Compliance Branch

Enclosure

cc: Jennifer R. Kaduck, GAEPD
Ken Grall, GAEPD

RCRA Inspection Report

1) Inspector and Author of Report

Daryl Himes
Environmental Engineer

2) Facility Information

General Motors Assembly Plant, (GM)
3900 Motors Industrial Way
Doraville, Georgia 30360-3163
(770) 455-5307
GAD 003 310 810

3) Responsible Official

Dan Hughes, Environmental & Energy Manager

4) Inspection Participants

Dan Hughs, GM
Lloyd Kaylor, GM
Ken Grall, GAEPD
Daryl Himes, US EPA
Larry Lamberth, US EPA

5) Date and Time of Inspection

August 23, 2000, 10:15 A.M.

6) Applicable Regulations

Title 40 Code of Federal Regulations (CFR) Parts 260 through 270.

Chapter 391-3-11 of the Georgia Hazardous Waste Management Act, adopted and incorporated by reference Parts 260 - 266, 268, & 270.

7) Purpose of Inspection

To conduct an unannounced compliance evaluation inspection (CEI) and determine the facility's compliance with all applicable regulations.

8) Facility Description

The GM Doraville facility is an automotive final assembly plant which assembles Chevrolet Venture, Oldsmobile Silhouette, and the Pontiac Montana. Parts are received by truck and by rail. Metal treatment operations performed include phosphating, electro-coating (ELPO), prime coating, base-coating, and clear-coating.

The facility covers approximately one-hundred and sixty-six acres. GM operates, on two nine-hour shifts, five days a week. There are approximately two hundred and seventy employees. GM has been operating since approximately 1946.

9) Findings

Following a presentation of credentials by EPA representatives, a brief discussion of the facility's operations and their management of hazardous waste generated within the facility was conducted. The walk-through portion of the inspection was then conducted which included: a windshield area, paint touch-up area, electro processing area, ninety (90) day storage area, paint tank room, paint mix room, and the wastewater treatment plant.

Windshield Area

One satellite container of hazardous waste was observed in this area. The drum was labeled with the words "Hazardous Waste" and closed.

Paint Touch Up Booths

One satellite container of hazardous waste was observed in the area outside the touch up booths. The fifty-five (55) gallon drum was labeled with the words "Hazardous Waste" and closed. Seven (7) touch up booths were being operated with at least five (5) booths having a small vat of solvent for tool cleaning purposes. Beneath the vats, the facility utilized five (5) gallon pails to transfer spent solvent from the vats to the satellite drum. Each pail was labeled with the words "Hazardous Waste." At the time of the

inspection, the pails were labeled with a D008 characteristic hazardous waste code. Facility personnel stated that this code was incorrect and would be corrected.

ELPO Area

During the metal surface treatment processing operations, the metal body of a car is submerged in a water-based primer. The primer is attached to the surface of the automobiles body when as electric charge is applied to the coating material and grounded by the body. The coating provides the foundation for a corrosion resistant finish. The coating contains a small amount of lead that is present to provide corrosion protection. The paint is filtered to remove impurities that might deposit on the metal surfaces. Spent filters are removed as required on a routine basis. Due to their lead content the filters are characteristically hazardous for lead and are collected in portable metal bins (5 ft. by 5 ft. by 2.5 ft) which are wheeled to the facility's ninety (90) day accumulation area and transferred to a roll-off container. At the time of the inspection, one portable container was present in the ELPO area with filters inside. The cart was closed and labeled with the words "Hazardous Waste" and an accumulation start date. The filters are accumulated and manifested off-site as D008 hazardous waste.

Paint Filter Bags

During the painting process, the metal body of a car is prime painted by submerging the car body in a tank of water based prime paint. Charging the paint tank and grounding the body deposits a uniform coating of paint on all surfaces. This coating of paint provides the foundation for a corrosion resistant finish. The paint contains small amounts of lead that provide the necessary corrosion protection. The paint is filtered to remove impurities that might deposit on the metal surfaces. Spent filters are removed as required on a routine basis. These filters are collected and transferred to drums. The filters are accumulated and properly disposed as hazardous waste D008.

In an area beneath the coating tanks, leaks of the liquid coating material were observed onto the floor below. A majority of the liquid falling in this area was observed to be draining into a concrete ditch which is connected to the facility's wastewater treatment area. Some of the material, however, was observed to be solidifying and collecting on the surface of the concrete in this area. **GM has failed to adhere to a condition for exemption from RCRA § 3005 given in 40 C.F.R. § 262.34(a)(1)(i) by allowing material from ELPO tanks to accumulate on the floor without being placed in containers.** Areas adjacent to that where the liquid was leaking onto the concrete were covered by a disposable layer of foil. These areas were relatively free of any leaks or dried on material at the time of the inspection.

Hazardous Waste Storage Pad (HWSP)

The HWSP is a concrete base which is covered with skid & chemical resistant coating. The pad is bermed, sloped and has a collection sump to collect water run-off from rain and other free liquids from leaks or spills. The pad has metal walls, a metal roof, and a chain-link gated fence.

During the inspection, twenty-three (23) containers of hazardous waste were observed in this area. Each container was in good condition, closed, and labeled with the words "Hazardous Waste" and an accumulation start date of less than ninety (90) days.

Four (4) pallets of lead acid batteries were observed in this area. The batteries were dated and in storage for less than one year in accordance with the requirements for a universal waste.

One satellite container of aerosol cans was also being managed as hazardous on the pad. The container was labeled and closed.

More than twenty (20) boxes of spent flourescent light bulbs were observed. The boxes were stacked on a pallet and were shrink-wrapped to keep them in place. Each box was in good

condition, closed, and labeled with the words "Hazardous Waste," and an accumulation start date of less than ninety (90) days.

Two (2) drums of mercury containing light ballasts were also in this area. The drums were labeled "Hazardous Waste" and dated.

At the time of the inspection, one portable container which is used occasionally in the ELPO area for the collection and transfer of hazardous waste filters was observed near a roll-off container used to manage the spent filters. The roll-off container was in good condition, closed, and labeled with the words "Hazardous Waste" and an accumulation start date of less than ninety (90) days. The cart, which had numerous spent filters stuck to the bottom inside, was closed and labeled only with the words "Hazardous Waste." **GM has failed to adhere to a condition for exemption from RCRA § 3005 given in 40 C.F.R. § 262.34(a)(2) by failing to label containers managing hazardous waste with an accumulation start date.**

Fourteen (14) fifty-five (55) gallon containers of used oil were observed in this area. All of the containers were labeled with the words "Used Oil."

Waste Purge Thinner Tank

Virgin and waste paint thinners are stored in adjacent seven-thousand five hundred (7,500) gallon tanks inside a paint tank room. The virgin thinner and spent thinner tanks are provided with lined secondary containment to contain spills. The volume of the secondary containment was adequate to contain the volume of one of the tanks. Spent thinner is transferred to the spent thinner tank by pipes through a gravity drain system which is free of pumps. The thinner is used to clean lines and equipment following a change of color. Spent solvent is removed from this tank in five thousand (5,000) gallon lots and transferred to a reclaim facility. The reclaimed material is reconstituted to GM specifications. The tank was equipped with a conservation vent in accordance Level 1 requirements for 40 CFR Section 265 Subpart CC requirements.

Paint Mixing Area

During the inspection, two (2) fifty-five (55) gallon satellite containers were observed in a satellite accumulation area inside the paint mixing room. Each container was closed and labeled with the words hazardous waste. At the time of the inspection, the floors in this area were clean and free of any spilled paint residues.

Painting Building

The painting operations were observed from a room above the actual painting operations. Painting systems are in place for primer, top coat, and repair painting. Hazardous waste is generated when paint becomes obsolete or "Off-spec." A paint color may become obsolete from one model car to the next. When a color becomes obsolete, it is removed from the system. Occasionally, a batch of paint may become "Off-spec" and must be disposed. Waste paints are drummed, moved to an accumulation area and transported off-site for fuel blending as D001 hazardous waste.

Waste Water Treatment Area

Over flows from the phosphate coating process are collected in a central drainage system and pumped to the on-site waste water pretreatment system. At the treatment facility, pH is lowered and raised to points of solubility of metals using sulfuric acid and hydrated lime. After precipitation, sludge is removed, thickened and dewatered. At the time of the inspection, the sludge, a F019 listed hazardous waste, was accumulating in of two (2) thirty-two (32) cubic yard roll-offs which were labeled with the words "Hazardous Waste" and an accumulation start date of less than ninety (90) days.

Record Review:

The following records were reviewed:

Manifests: All manifests generated since the last inspection were reviewed. The manifests were signed by a facility representative, transporter, and a return copy signed by the receiving facility. All Land Disposal Restriction documentation was completed for each type of waste by being either attached to the individual manifest or by being performed on a one time basis, based on the characteristics of the waste staying the same.

Inspection Logs: Inspection logs for the HWSP and tanks were complete and up to date.

Contingency Plan: A review of the contingency plan was conducted the listing of the emergency coordinators had not been updated to reflect the change of Don Smith being replaced by Dan Hughes.

Personnel Training: A review of the personnel training records indicated that facility personnel would need to compile the records in a manner which would reflect the positions at the facility responsible for management of hazardous wastes, their job description and required training, and records to reflect their annual training.

Waste Analysis Plan: A copy of the Waste Analysis Plan was available for review and appeared to be complete.

Copies of the facility's fee records and biennial reports were available for review.

10) Signed

Daryl R. Himes
Environmental Engineer

Date 9/12/00

11) Concurrence

Jeffrey T. Pallas, Chief
South Enforcement and Compliance
Section
Enforcement and Compliance Branch

9/15/00
Date